IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO. 08 - 016**

> **DATE FILED:** 5-21-08 v.

KULEE TAILEY : VIOLATIONS:

> : 18 U.S.C. § 2119 (carjacking - 2 counts) 18 U.S.C. § 924(c) (using and carrying a

: firearm during a crime of violence - 2 counts)

18 U.S.C. § 2 (aiding and abetting)

SUPERSEDING INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about August 24, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KULEE TAILEY,

with intent to cause death and serious bodily harm, took, and aided and abetted the taking, from the person of another, H.H., by force, violence, and intimidation, that is, at the point of a black handgun, a 2006 Toyota Corolla, vehicle identification number **REDACTED**, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about August 24, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KULEE TAILEY

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a black handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the carjacking of a 2006 Toyota Corolla, in violation of Title 18, United States Code, Section 2119.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER THAT:

On or about August 26, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KULEE TAILEY,

with intent to cause death and serious bodily harm, took, and aided and abetted the taking, from the person of another, N.S., by force, violence, and intimidation, that is, at the point of a black semi-automatic handgun, a 2004 Nissan Armada, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about August 26, 2007, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

KULEE TAILEY

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a

black semi-automatic handgun, during and in relation to a crime of violence for which he may be

prosecuted in a court of the United States, that is, the carjacking of a 2004 Nissan Armada, in

violation of Title 18, United States Code, Section 2119.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

PATRICK L. MEEHAN United States Attorney